

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN, and BTA)
BANK JSC,)

Plaintiffs,)

v.)

MUKHTAR ABLYAZOV, ILYAS)
KHRAPUNOV, VIKTOR KHRAPUNOV and)
TRIRDOU SPV S.A.,)

Defendants.)

No. 15-cv-05345(AJN)(KHP)

I, ANDREW T. SOLOMON, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the attorney for defendants Iliyas Khrapunov and Viktor Khrapunov in the above-entitled action. I submit this declaration in support of Viktor Khrapunov's renewed motion to dismiss Plaintiffs' claims against him on the ground that the Court lacks personal jurisdiction over him.

2. This declaration is based on facts personally known to me based on my review of the deposition transcripts generated in this action.

3. Attached hereto are true copies of the following deposition transcript excerpts:

Exhibit	Witness	Deposition Date
A	Bourg, N.	9/11/2017
B	Chetrit, J.	5/25/2017
C	Darmanbekov, B.	5/10/2017
D	Gillieron, M.	12/18/2017
E	Khrapunov, I.	2/2/2018
F	Khrapunov, V.	1/13/2018
G	Nurgabylov, N	10/3/2017
H	Petelina, E.	12/18/2017
I	Rosabianca, L	1/17/2018

4. In accordance with the Court's individual practices, I also attach as Exhibits K and L the relevant pleadings: the ECF 426 and ECF 433, which are the Court's memorandum and order dated September 26, 2017 and the Second Amended Crossclaims.

I declare under penalties of perjury that the foregoing is true and correct.

Executed on the 20th day of June 2018,

/s/ Andrew T. Solomon

Andrew T. Solomon